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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Parts 15 and 90
of the Commission's Rules to
Provide Additional Frequencies
for Cordless Telephones

ET Docket No. 93-235

**COMMENTS OF THE CONSUMER ELECTRONICS GROUP
OF THE ELECTRONIC INDUSTRIES ASSOCIATION**

The Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") hereby responds to the above-captioned Notice of Proposed Rulemaking ("Notice").¹ The proposals in the Notice are based upon a petition for rulemaking filed last year by the Telecommunications Industry Association ("TIA"). TIA had asked the Commission to make available 15 additional channel pairs for cordless telephones operating near 44 and 49 MHz, and the Commission has now tentatively agreed to do so.

The frequencies which are now proposed for use by cordless phones are currently authorized exclusively to the Private Land Mobile Radio Service, and present use of these frequencies is apparently quite limited. The proposal to allow these frequencies to be used for cordless phones, on a secondary basis, is based on the record developed in response to TIA's petition for rulemaking. That record demonstrated, among other things, that (1) there is considerable congestion resulting from the current availability of only 10 channels for cordless phones (five of which channels are also used by other devices, such as wireless baby

¹/ FCC 93-422 (released September 17, 1993).

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monitors), and (2) there is a strong consumer interest in having cordless phones with additional channel capacity.

The Notice specifically requests comment on the likely effect of the Commission's proposal on the reception of TV broadcasting (§ 11). Tests conducted by an EIA/CEG member, at the suggestion of EIA's Video Systems Engineering Committee (R-4), have revealed that the potential for interference is negligible, except where the cordless phone unit is quite close to the television set. EIA/CEG therefore believes the primary prophylactic measure needed is the one already proposed in the Notice (§ 16), that is, to restrict the lower (44 MHz) frequencies for use by cordless base units instead of cordless handsets.

In addition, EIA/CEG believes it is desirable for the Commission to require cordless phone manufacturers to include, in the instruction manual supplied with the product, a cautionary note to users along the following lines:

Some cordless telephones operate at frequencies that may cause interference with nearby TVs and VCRs. To minimize or prevent such interference, do not place the base of your cordless phone on top of, or near, a TV or VCR. If you experience interference in the operation of your TV or VCR that is caused by a cordless phone, moving the phone farther away from the TV or VCR will often reduce or eliminate the interference.²

The test results discussed above also indicate the necessity of not assigning any further cordless frequencies (beyond those covered by the current proposal) in the TV IF passband. The only remaining frequencies are close to the video and color carrier frequencies, and the danger of interference would be substantially greater than in the case of the frequencies which are at issue in the present Notice.

^{2/} Alternatively, the Commission might wish to adapt the language currently specified in 47 C.F.R. § 15.105(b) (i.e., for instruction manuals for Class B digital devices) for use in conjunction with cordless phones. In that case, the Commission should modify the required notice by deleting the first two sentences and the first and last bullets at the end.

Besides the specific information provided above, EIA/CEG believes that certain more general comments are also in order. This proceeding serves to highlight, once again, the extraordinary benefits made available to consumers by products authorized under Part 15 of the Commission's rules. In the scant ten years since cordless phones were first authorized at 46 and 49 MHz, literally tens of millions of these products have been sold to consumers. As the Notice observes (§ 3), "sales and use of cordless telephone have grown steadily" over the past decade. Meanwhile, prices have declined, new features have been added, and the range of choices has expanded.

These kinds of benefits -- competition, innovation, features, quality, and choice -- are demonstrated routinely by Part 15 products. Cordless phones, televisions, videocassette recorders, personal computers -- these are just a few of the products brought to consumers by perhaps the most competitive industry that exists today, the consumer electronics industry. And it is the Part 15 rules which ensure that these kinds of products, which generate or use radiofrequency energy, can continue to be produced and used without causing harmful interference to authorized radio services.³

^{3/} As the Notice points out (§ 8), the market is beginning to develop for advanced cordless phones operating in the 902-928 MHz band. These advanced digital products use spread spectrum technology, provide for greater security against eavesdroppers, and operate at considerably longer distances. The 900 MHz cordless phones and the numerous other Part 15 products that are being developed for operation at 900 MHz frequencies are likely to produce considerable functional and economic benefits for American businesses and residential consumers. It is for this reason that EIA/CEG has expressed grave reservations about the Commission's proposal to expand private radio usage of the 902-928 MHz frequencies, which the Commission encouraged Part 15 equipment manufacturers to use just a few short years ago. See Comments of EIA/CEG, PR Docket No. 93-61 (June 29, 1993); Reply Comments of EIA/CEG, PR Docket No. 93-61 (July 29, 1993).

EIA/CEG therefore urges the Commission to continue to promote opportunities for development, sale, and use of Part 15 products, so that the resulting benefits can continue to be enjoyed by individuals and businesses across the Nation.

Respectfully Submitted,

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